

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:  SHADHAN ALAM Debtor,  TOYOTA MOTOR CREDIT CORPORATION Movant,  v.  SHADHAN ALAM, and REGINE LOMBARD, Non-Filing Co-Debtor, and KENNETH E. WEST, Trustee Respondents	Bankruptcy No. 24-13339-pmm  Chapter 13
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NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Toyota Motor Credit Corporation has filed a Motion for Relief and Co-Debtor Relief from the Automatic Stay with the Court to lift the automatic stay regarding the 2024 Toyota Prius, VIN: JTDADABU3R3012573.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before September 5, 2025, you or your attorney must do **all** of the following:

(a) file an answer explaining your position at:

Clerk, United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorneys:

Keri P. Ebeck, Esquire  
Bernstein-Burkley, P.C.  
601 Grant Street, 9<sup>th</sup> Floor  
Pittsburgh, PA 15219

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on September 24, 2025 1:00 p.m., Courtroom# 3, 900 Market Street, Suite 400, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at [\(215\) 408-2800](tel:(215)408-2800) to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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Dated: August 22, 2025